

EXHIBIT 04

**REQUEST FOR THE RETURN OF ABDUCTED CHILDREN
PURSUANT TO THE HAGUE CONVENTION OF 25 OCTOBER 1980**

REQUESTING CENTRAL AUTHORITY OR APPLICANT: FRANCE

REQUESTED CENTRAL AUTHORITY: UNITED STATES OF AMERICA

Concerns the following children:

1 - CHILDREN IDENTITIES AND IDENTITIES OF THEIR PARENTS

1 - THE CHILDREN

Paris, Eva, Female
Born January 15th, 2015 in Ashland, Oregon

Paris, Juliette, Female
Born January 15th, 2015 in Ashland, Oregon

Habitual residence before the children abduction or possession in foreign countries:

4 rue Malher, 75004 Paris from September 2019 to July 2022

Then :

13 rue Ferdinand Duval, 75004 since July 2022

Description (see picture exhibit n°2):

2 - PARENTS

2.1 - Mother

Last name and first names: **BROWN Heidi**
Date and place of birth: March 30st, 1982 in Ashland, Oregon
Citizenship: Amercian
Occupation: Head of Marketing
Habitual residence:
4 rue Malher, 75004 Paris from September 2019 to July 2022
Then :
13 rue Ferdinand Duval, 75004 since July 2022
Then :
665 Leonard Street, Ashland, OR 97520
Then :
2256 Abbott Ave, Ashland, OR 97520

2.2 - Father

Last name and first names: Paris Arnaud
Date and place of birth: April 14th, 1978 in Longjumeau, France
Citizenship: French-American
Occupation: Technical Director VR
Habitual residence:
4 rue Malher, 75004 Paris from September 2019 to July 2022
Then :
13 rue Ferdinand Duval, 75004 since July 2022

2.3 - Date and place of the wedding

Not married

3 – REQUESTING PARTY OR INSTITUTION

Last name and first names: **PARIS Arnaud**
Date and place of birth: April 14th, 1978 in Longjumeau, France
Citizenship: French-American
Occupation: Technical Director VR
Habitual residence:
4 rue Malher, 75004 Paris from September 2019 to July 2022
Then :
13 rue Ferdinand Duval, 75004 since July 2022
Relationship with the children: Father

Represented Pro Per in France.

4 – PLACE WHERE THE CHILDREN ARE SUPPOSED TO BE

4.1 - Information about the person who is suspected of having abducted or of currently keeping the child:

Last name and first names: Brown Heidi
Date and place of birth: March 30st, 1982 in Ashland, Oregon
Citizenship: American
Occupation: Head of Marketing
Habitual residence:
4 rue Malher, 75004 Paris from September 2019 to July 2022
Then :

13 rue Ferdinand Duval, 75004 since July 2022

Then :

665 Leonard Street, Ashland, OR 97520

Then :

2256 Abbott Ave, Ashland, OR 97520

4.2 – Current address of the children:

Unknown, possibly 2256 Abbott Ave, Ashland, OR 97520

5 – HOUR, PLACE, DATE AND CIRCUMSTANCES OF THE CHILDREN ABDUCTION

Mother was spending her visitation time with the kids in France per the French judgment during the spring vacation from April 5th to April 13th. Mother came to France to see the girls with her mother, Margareth Brown Olson, and she had planned to spend their vacation time with the girls during that week in the South of France at the Holiday Inn in Perpignan.

On Monday April 8th, Mother, Grandmother and the children left the Holiday Inn leaving behind the girls' luggage in the morning and started an escape out of Europe through Spain which put Mother and Grandmother in full violation of the restraining order that required that the children stay in France during her visitation time.

It is believed that they went through an illegal way to then leave Europe avoiding passport control of the children that would have normally resulted in an alert that the children were not to leave France nor Europe under the restraining order. Their escape route most likely was to reach Morocco by boat from Spain and from there the boarded a plane to the US.

In order to prevent the children from raising an alert during that escape, Mother prevented any communication to happen with Father since Saturday April 6th and even left behind all the smart devices from the children and their luggage in the hotel room to make sure they couldn't be located during their escape from France and Europe.

On Thursday April 11th Mother failed to participate to an online mediation with Father and in the afternoon she called the Holiday Inn in Perpignan to indicate them that they wouldn't finish their stay and that they were returning to the US and that the children luggage were to be shipped back directly to them in the US.

On Saturday April 13th Father received an email from Mother informing him that she had taken the kids back to the US confirming that she had committed a full-fledged kidnapping in total violation of the restraining order that she had told a French judge the week before in Paris she would never dare to violate...

6 – FACTUAL AND LEGAL REASONS IN SUPPORT OF THE PRESENT REQUEST

The children's habitual residence is in France as they have been living with Father in Paris at his residence since July 23rd 2023 as he was granted full custody of the children in France by the Paris family court judgment from April 21st 2023. The children have been in their Paris historical school the entire school year since early September 2023 until Mother and Grandmother committed a full-fledged abduction on or about April 8th 2024 escaping illegally France and Europe in total violation of the restraining order in place since August 25th 2023.

I, Father, have parental authority, which I exercise jointly with Mother under French law (Articles 371-1 and 372 of the Civil Code).

The French Judgement from the Family Court in Paris is confirming that the presence of the children in Oregon during the school year 2022-2023 was only temporary per the agreement made between the parents in July 2022 in Paris which granted extended and continued home state jurisdiction to France until their return to France in July 2023.

A removal of the children from France in the middle of the school year constitutes a gross denial of the parental rights from Father in contradiction with both French Judgements from April 21st 2023 and August 25th 2023.

7 – PROCEDURE IN CIVIL LAW, IN FRANCE AND IN THE REQUESTED STATE

There was a custodial determination made in Paris on April 21st, 2023 that confirmed that Mother and children presence in Oregon was temporary, that Father continued to live in France and that the children would be under Father's custody and their residence set in Paris and they would resume their schools there next school year.

French case reference: RG 22/38495

Father registered the French Judgement in the Jackson County court in Oregon on May 9th 2023 under case number 23DR08269.

Mother tried to make a competing custodial action in Oregon under case number 22DR17285 that was filed after Father filed in France and he obtained judgment first in France. Which under the principle of Committee makes the French judgment take priority over the Oregon judgment obtained afterwards especially as it was done in bad faith by Mother and Father was denied due process by the Jackson County court.

On August 25th, 2023 Father obtained a restraining order that prevented the children from leaving France to protect the first French judgment from April 21st, 2023 as Mother had clearly indicated that she was not going to respect that French judgment and she was a high risk of kidnapping the children from France to the US in total violation of Father's custodial rights.

French case reference: RG 23/37100

8 – THE CHILD MUST BE RETURNED TO:

Last name and first names: Paris Arnaud
Date and place of birth: April 14th, 1978 in Longjumeau, France
Citizenship: French-American
Occupation: Technical Director VR
Habitual residence: 13 rue Ferdinand Duval, 75004 Paris
Parental relationship with the children: Father
Phone number: +33688283641
Email address: aparis@sysmicfilms.com

Arrangements provided for the child's return:

Return to the father's apartment in the 4th district of Paris where they also have their school.

9 – ADDITIONNAL COMMENTS

Mother and Grand Mother are under a criminal investigation in France for child abduction and violation of the restraining order that they violated on French soil while the French judgment was in full force and effect and no US custody judgment had been registered in France.

10 – LIST OF THE ATTACHED DOCUMENTS:

- 01 – Births Certificate
- 02 – Children Pictures
- 03 – Paris School certificates for both children for school year 2023-2024
- 04 – Relevant articles of the French civil code in English
- 05 – French Judgement of April 2023 granting full custody to Father in Paris.
- 06 – French Judgement of August 2023 establishing restraining order on the girls in France.
- 07 – Email from April 13th from Heidi Brown saying that she has taken the children to the US.
- 08 – French Passports of the Children
- 09 – Arnaud PARIS French passport
- 10 – Arnaud PARIS US passport
- 11 – Heidi BROWN US passport

AUTHORIZATION

Please accept this letter as written authorization, as may be required by Article 28 of the Hague Convention of the Civil Aspects of International Child Abduction, empowering the Requested Central Authority of France and of the USA or their designated representative, to act on my behalf.

Name of the applicant: PARIS Arnaud

Date: April 15th, 2023

Place: Paris, France

Signature:

A handwritten signature in black ink, appearing to be 'PARIS Arnaud', written in a cursive style.